



July 16, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW TW-B204
Washington, DC 20554

Re: Application by Qwest Communications International, Inc. for
Authority Under Section 271 of the Communications Act to Provide In-
Region, InterLATA Services in the States of Colorado, Idaho, Iowa,
Nebraska and North Dakota, WC Docket 02-148

Dear Ms. Dortch:

On July 15, 2002, Penny Bewick and Rob McMillan of New Edge Networks, Inc. ("New Edge") and the undersigned participated in a conference call with the following FCC staff members to discuss Qwest's pending application to provide in-region, interLATA telecommunications services in Colorado, Idaho, Iowa, Nebraska and North Dakota: Michael Carowitz, Ty Cottrill, Michael Engel, Sharon Lee, and Elizabeth Yockus.

First, New Edge described its concerns about the competitive impact of Qwest's unfiled interconnection agreements, which are being investigated by several state commissions and are the subject of Qwest's pending Petition for Declaratory Ruling. New Edge and CompTel urged the Commission to reject Qwest's 271 application until the Commission determines which agreements under Section 252(a)(1) must be filed with state commissions pursuant to Section 252(e).

Second, New Edge explained that Qwest's change management process is deficient because Qwest does not provide competitors with notice of changes to its processes and products at parity with Qwest's own retail division, as described in the comments filed by CompTel and New Edge.

Third, New Edge explained that Qwest does not comply with the resale requirements contained in Section 271(c)(2)(B)(xiv) because Qwest will not provide New Edge with the ability to resell Qwest's frame relay and ATM services at the avoided cost discount mandated by Section 251(c)(4).

Fourth, New Edge discussed its concern that Qwest is violating the restriction on the provision of in-region interLATA services contained in Section 271. Specifically, New Edge

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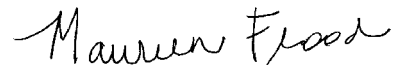
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believes that Qwest has waived the LATA-based ATM connection requirement for a certain large ISP that purchases DSL services from Qwest, resulting in the illegal provision of long distance services.

Finally, New Edge discussed its concerns about Qwest's charges for unbundled dedicated transport and collocation. New Edge believes that these charges do not comply with the FCC's TELRIC pricing standard and there is no rational relationship among the rate structure or rate levels across the states which are included in Qwest's pending Section 271 application.

Please contact the undersigned if you have any questions concerning these matters.

Sincerely,

A handwritten signature in cursive script that reads "Maureen Flood".

Maureen Flood
Director, Regulatory and State Affairs

CC: Michael Carowitz
Ty Cottrill
Michael Engel
Sharon Lee
Elizabeth Yockus

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